

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

In re	:	
	:	Chapter 11
LTL MANAGEMENT LLC, ¹	:	
	:	Case No. 21-30589 (JCW)
Debtor.	:	
	:	
LTL MANAGEMENT LLC,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Adv. Pro. No. 21-03032 (JCW)
	:	
THOSE PARTIES LISTED ON	:	
APPENDIX A TO COMPLAINT and	:	
JOHN AND JANE DOES 1-1000,	:	
	:	
Defendants.	:	
	:	

**NOTICE OF EMERGENCY HEARING
ON ADVERSARY PROCEEDING PLEADINGS**

PLEASE TAKE NOTICE THAT on October 14, 2021 (the “Petition Date”) plaintiff LTL Management LLC, the debtor in the above-captioned case and the plaintiff in the above-captioned adversary proceeding (the “Debtor”), commenced its reorganization case (the “Chapter 11 Case”) by filing a voluntary petition under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Western District of North Carolina. On the Petition Date, the Debtor also filed certain additional pleadings seeking first day relief (the “First Day Pleadings”).²

¹ The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

² All pleadings and other documents filed in the Chapter 11 Case and the Adversary Proceeding may be accessed (a) at the Clerk of Court’s office, (b) through the website maintained by the Debtor’s claims and

PLEASE TAKE FURTHER NOTICE that on October 15, 2021 the Court entered the Ex Parte Order (I) Scheduling an Expedited Hearing on Certain First Day Pleadings and (II) Approving the Form and Manner of Limited Notice Thereof [Dkt. 34] in the Chapter 11 Case and scheduled the expedited hearing for October 20, 2021 (the “First Day Hearing”).

PLEASE TAKE FURTHER NOTICE that the Court, having reviewed the First Day Pleadings, and having considered the statements of counsel at the First Day Hearing, directed the Debtor to file the following pleadings (the “Adversary Proceeding Pleadings”):

- (a) *Debtor’s Complaint for Declaratory and Injunctive Relief (I) Declaring That the Automatic Stay Applies to Certain Actions Against Non-Debtors Or, (II) Preliminarily Enjoining Such Actions and (III) Granting a Temporary Restraining Order Pending a Final Hearing* [Adv. Pro. Dkt. 1] (the “Complaint”);³
- (b) *Debtor’s Motion for an Order (I) Declaring That the Automatic Stay Applies to Certain Actions Against Non-Debtors Or (II) Preliminarily Enjoining Such Actions and (III) Granting a Temporary Restraining Order Pending a Final Hearing* [Adv. Pro. Dkt. 2] (the “Injunction Motion”); and
- (c) *Debtor’s Ex Parte Motion Requesting Authority to Exceed Maximum Page Limit* [Adv. Pro. Dkt. 4].⁴

PLEASE TAKE FURTHER NOTICE THAT at the Court’s direction an emergency hearing to consider the Adversary Pleadings will be held before the Honorable Judge J. Craig Whitley on October 22, 2021 at 1:30 p.m. (prevailing Eastern Time) at the United States

noticing agent at <https://dm.epiq11.com/LTL> free of charge or (c) through PACER on the Court’s website at <https://www.ncwb.uscourts.gov> for a nominal fee.

³ At the emergency hearing, the Court will limit its consideration of the Complaint and the Injunction Motion to only the Debtor’s request for entry of a temporary restraining order and its alternative request for entry of an order declaring that the automatic stay applies to certain talc-related claims against the Debtor, whether asserted against the Debtor or the “Protected Parties” identified in Appendix B to the Complaint and the Injunction Motion. A hearing on the Debtor’s request for a preliminary injunction will be held at a later date.

⁴ Due to the ex parte nature of the relief requested, the Court may enter an order granting the *Debtor’s Motion Requesting Authority to Exceed Maximum Page Limit* prior to the Hearing.

Bankruptcy Court for the Western District of North Carolina, Charlotte Division, 401 West Trade Street, Charlotte, North Carolina 28202, in Courtroom 8.

Dated: October 21, 2021
Charlotte, North Carolina

Respectfully submitted,

/s/ John R. Miller, Jr.

C. Richard Rayburn, Jr. (NC 6357)
John R. Miller, Jr. (NC 28689)
Matthew L. Tomsic (NC 52431)
RAYBURN COOPER & DURHAM, P.A.
227 West Trade Street, Suite 1200
Charlotte, North Carolina 28202
Telephone: (704) 334-0891
Facsimile: (704) 377-1897
E-mail: rrayburn@rcdlaw.net
jmiller@rcdlaw.net
mtomsic@rcdlaw.net

Gregory M. Gordon (TX Bar No. 08435300)
Dan B. Prieto (TX Bar No. 24048744)
Amanda Rush (TX Bar No. 24079422)
JONES DAY
2727 N. Harwood Street
Dallas, Texas 75201
Telephone: (214) 220-3939
Facsimile: (214) 969-5100
E-mail: gmgordon@jonesday.com
dbprieto@jonesday.com
asrush@jonesday.com
(Admitted *pro hac vice*)

Brad B. Erens (IL Bar No. 06206864)
JONES DAY
77 West Wacker
Chicago, Illinois 60601
Telephone: (312) 782-3939
Facsimile: (312) 782-8585
E-mail: bberens@jonesday.com
(Admitted *pro hac vice*)

PROPOSED ATTORNEYS FOR DEBTOR